

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

VIDEOMINING CORPORATION,

Bankruptcy No. 20-20425-GLT

Debtor.

Chapter 11

VIDEOMINING CORPORATION,

Document No.

Movant,

vs.

NO RESPONDENT.

**EMERGENCY MOTION FOR AN ORDER AUTHORIZING MAINTENANCE OF
EXISTING BANK ACCOUNT**

AND NOW comes VideoMining Corporation, by and through its Counsel, Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl and files this **EMERGENCY MOTION FOR AN ORDER AUTHORIZING MAINTENANCE OF EXISTING BANK ACCOUNT** as follows:

1. The Movant is VideoMining Corporation (“VideoMining” or “Debtor”).
2. This Case was commenced on February 4, 2020.
3. The Debtor collects video data from grocery and convenient stores regarding shoppers’ in store behavior, analyzes said data, and then packages and sells the same to product retailers.
4. The United States Trustee has established operating guidelines for Debtors-in-Possession including the requirement to close all existing accounts and open new Debtor-in-Possession accounts.

5. Pre-petition, the Debtor held its accounts at Enterprise Bank and Citizens Bank. The account at Enterprise Bank was used predominantly to collect payments from customers, make payments to vendors and to fund payroll.

6. The Debtor seeks a wavier of the United States Trustee's requirement to open new accounts and permission to maintain its existing account at Enterprise Bank. The Debtor will close its account at Citizens Bank.

7. If the Debtor was required to close the Enterprise Bank Account, the operation of the Debtor's business could be harmed as the Debtor may be unable to timely receive and remit required payments, thus disrupting cash flow and the ongoing business operations of the Debtor.

8. The Debtor will disclose all activity within all of its accounts on its Monthly Operating Reports. Further, the Debtor will cooperate with the assigned Bankruptcy Analyst of the United States Trustee in disclosing and explaining information.

9. The Debtor is respectfully requesting that this Court allow it to continue use of its pre-petition bank account at Enterprise Bank.

WHEREFORE, the Movant respectfully requests that this Honorable Court enter an order authorizing the Debtor to maintain the use of its pre-petition bank account at Enterprise Bank.

Respectfully Submitted,

Date: February 5, 2020

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
PA I.D. #205694
RYAN J. COONEY
PA I.D. #319213
SY O. LAMPL
PA I.D. #324741
223 Fourth Avenue, 4th Fl.
Pittsburgh, PA 15222
(412) 392-0330 (phone)
(412) 392-0335 (facsimile)
Email: rlampl@lampllaw.com

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CERTIFICATE OF SERVICE

I, Robert O Lampl, hereby certify, that on the 5th day of February, 2020, a true and correct copy of the foregoing **EMERGENCY MOTION FOR AN ORDER AUTHORIZING MAINTENANCE OF EXISTING BANK ACCOUNT** was served upon the following (*via electronic service, hand delivery and/or First-Class U.S. Mail*):

Office of the U.S. Trustee
970 Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222
Norma.hildenbrand@usdoj.gov

Date: February 5, 2020

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
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